

## Document Log Item

<b>Addressing</b>	
<b>From</b>	<b>To</b>
Carl Goldstein/R9/USEPA/US	jcox@cosintl.com
<b>CC</b>	<b>BCC</b>
gdc@tidepool.com	
<b>Description</b> <span>Form Used: Memo</span>	
<b>Subject</b>	<b>Date/Time</b>
Letter to Canneries	10/28/1999 01:08 PM
<b># of Attachments</b>	<b>Total Bytes</b>
0	6,882
<b>NPM</b>	<b>Contributor</b>
	Marcela VonVacano
<b>Processing</b>	
<b>Comments</b>	

Body

## Document Body

The letter to each permittee follows. I have faxed the letter to the canneries.

**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION IX**

**Pacific Insular Areas Program  
75 Hawthorne Street  
San Francisco, CA 94105**

October

28,

1999

Herman  
General  
COS

Samoa

Packing

Gebauer  
Manager  
Company

P.O. Box 957  
Pago Pago, AS 96799

RE: NPDES Permit Discharge Monitoring Requirements  
Permit No. AS0000027

Dear Mr. Gebauer:

It has been brought to my attention that COS Samoa Packing Company has failed to comply with certain discharge monitoring and reporting requirements stipulated in your NPDES permit.

Specifically, COS Samoa Packing Company has not submitted the monitoring results for the following effluent characteristics listed in Section A of the permit. These monitoring results are to be reported on a semi-annual basis and were due in March 1999:

-	Acute	Toxicity
-	Total	Cadmium
-	Total	Chromium
-	Total	Lead
-	Total	Mercury
-	Total	Zinc

Additionally, COS Samoa Packing Company has not submitted the Priority Pollutant Scan, as required in Section D.2., also due on a semi-annual basis and due in March 1999.

Furthermore, the above cited monitoring requirements and results are next due in November 1999. As permittee, COS Samoa Packing Company must comply with all conditions of their permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for an enforcement action.

Please provide us with the following information within thirty (30) days of receipt of this letter.

1. Why COS Samoa Packing Company has failed to meet the cited monitoring requirements of their permit.

3. In the future, what does COS Samoa Packing Company intend to do to avoid noncompliance concerning their discharge monitoring and reporting requirements in their permit, to prevent similar occurrences.

Sincerely,

cc: ASEPA  
Jim Cox

October			28,		1999
Phil					Thirkel
StarKist		Samoa		Plant	Manager
StarKist			Samoa,		Inc.
PO			Box		368
Pago		Pago,		AS	96799
RE:	NPDES	Permit	Discharge	Monitoring	Requirements
Permit			No.		AS0000019

Dear

Mr.

Thirkel:

It has been brought to my attention that StarKist Samoa Inc. has failed to comply with certain discharge monitoring and reporting requirements stipulated in your NPDES permit.

Specifically, StarKist Samoa Inc. has not submitted the monitoring results for the following effluent characteristics listed in Section A of the permit. These monitoring results are to be reported on a semi-annual basis and were due in March 1999:

-	Acute	Toxicity
-	Total	Cadmium
-	Total	Chromium
-	Total	Lead
-	Total	Mercury
-	Total	Zinc

Additionally, StarKist Samoa Inc. has not submitted the Priority Pollutant Scan, as required in Section D.2., also due on a semi-annual basis and due in March 1999.

Furthermore, the above cited monitoring requirements and results are next due in November 1999. As permittee, StarKist Samoa Inc. must comply with all conditions of their permit. Any permit noncompliance constitutes a violation of the Clean Water Act and is grounds for an enforcement action.

Please provide us with the following information within thirty (30) days of receipt of this letter.

1. Why StarKist Samoa Inc. has failed to meet the monitoring requirements of their permit.
2. Whether StarKist Samoa Inc. intends to conduct the required monitoring to meet the reporting requirement of November 1999. If not, please explain why.
3. In the future, what does StarKist Samoa Inc. intend to do to avoid noncompliance concerning their discharge monitoring and reporting requirements in their permit, to prevent similar occurrences.

If you have any questions please contact me at (415)744-2170; e-mail:goldstein.carl@epa.gov.

Sincerely,

Carl

L.  
American

Samoa

Program

Goldstein  
Manager

cc:  
Jim

Cox

ASEPA